

**UNITED STATES U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERIKA LEE,

Plaintiff,

v.

DELTA AIR LINES, INC., DAVID NEEDHAM
& JOSE ROSADO,

Defendants.

Civil Action No. 1:22-cv-8618-DEH-RWL

EXHIBIT G

TO

DELTA'S LETTER

DATED

APRIL 7, 2025

2 UNITED STATES U.S. DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

3 Civil Action No. 1:22-cv-8618-DEH-RWL

4 - - - - -x
ERIKA LEE, :
5 :
Plaintiff, :
6 :
- vs - :
7 :
DELTA AIR LINES, INC., DAVID :
8 NEEDHAM and JOSE ROSADO, :
9 Defendants. :
- - - - -x


10
11 April 4, 2025
12 10:05 a.m.
13 101 Park Avenue
14 New York, NY
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16
17
18
19

20 STATEMENT OF NON-APPEARANCE BY MICHAEL
21 F. FLEMING, ESQ., held at the above-mentioned
22 time and place, before Randi Friedman, a
23 Registered Professional Reporter, within and for
24 the State of New York.
25

ERIKA LEE
APRIL 04, 2025

STATEMENT ON THE RECORD

JOB NO. 1555789

<p style="text-align: right;">Page 2</p> <p>1 Statement of Non-Appearance</p> <p>2 APPEARANCES:</p> <p>3 MORGAN LEWIS & BOCKIUS, LLP</p> <p>4 Attorneys for Defendants</p> <p>5 101 Park Avenue</p> <p>6 New York, New York 10178</p> <p>7 BY: MICHAEL F. FLEMING, ESQ.</p> <p>8 IMANI GUNN, ESQ.</p> <p>9 * * *</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 ALSO PRESENT:</p> <p>21 Val Cometto, Esq.</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 Statement of Non-Appearance</p> <p>2 MR. FLEMING: We're putting on the</p> <p>3 record today that plaintiff, Erika Lee, has</p> <p>4 not appeared for her noticed deposition.</p> <p>5 The deposition was noticed on February 27th,</p> <p>6 2025 for April 4th, 2025, today. That</p> <p>7 notice was sent based on a representation</p> <p>8 from Ms. Lee that she was available on</p> <p>9 April 4th to be deposed.</p> <p>10 Ms. Lee failed to respond to</p> <p>11 several emails from Delta's counsel</p> <p>12 regarding -- confirming today for the</p> <p>13 deposition. Delta's in-house counsel, Val</p> <p>14 Cometto, traveled to New York for the</p> <p>15 purposes of attending this deposition and</p> <p>16 has incurred costs related thereto.</p> <p>17 Delta intends to seek costs for</p> <p>18 the preparation and attendance of this</p> <p>19 deposition from Ms. Lee. That's it.</p> <p>20 (Time concluded: 10:07 a.m.)</p> <p>21 * * *</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 4</p> <p>1 Statement of Non-Appearance</p> <p>2 C E R T I F I C A T I O N</p> <p>3 I, Randi Friedman, Registered</p> <p>4 Professional Reporter and Notary Public of the</p> <p>5 State of New York, do hereby certify:</p> <p>6 THAT, the witness whose testimony is</p> <p>7 herein before set forth, was duly sworn by me,</p> <p>8 and</p> <p>9 THAT, the within transcript is a true</p> <p>10 record of the testimony given by said witness.</p> <p>11 I further certify that I am not related</p> <p>12 either by blood or marriage to any of the parties</p> <p>13 to this action; and that I am in no way</p> <p>14 interested in the outcome of this matter.</p> <p>15 IN WITNESS WHEREOF, I have hereunto</p> <p>16 set my hand this day, April 4, 2025.</p> <p>17</p> <p>18 </p> <p>19 Randi Friedman, RPR</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 * * * * *</p>	

ERIKA LEE
APRIL 04, 2025

STATEMENT ON THE RECORD

JOB NO. 1555789

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